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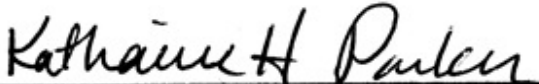
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May 21, 2021

VIA ECF

Hon. Katharine H. Parker, U.S.M.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.
6/7/2021

Re: In re Lifetrade Litigation, Case No. 17-cv-02987 (JPO)(KHP),
Letter Motion Seeking Leave to File Under Seal Materials Designated as
Confidential by Defendants as well as a Memorandum of Law, Attorney
Affirmation, and a Proposed Addendum to the Complaint, all of which Discuss
those Confidential Documents

Dear Judge Parker:

Pursuant to the Southern District of New York ("SDNY") Electronic Case Filing Rules & Instructions § 6, the SDNY procedures governing the filing of Sealed Records, and Your Honor's Individual Rules and Practices for filing materials under seal, Plaintiffs in the above-captioned action hereby respectfully seek leave to file under seal certain materials in connection with their Motion to Amend (the "Motion"), which is being contemporaneously filed.

The "Confidential Materials" include documents produced by Defendants in the action, which Defendants designated as "Confidential" pursuant to the terms of the Protective Order. Dkt. 223. The "Confidential Materials" also include a Memorandum of Law, an Affirmation or Declaration of Diane Paolicelli, and a proposed Confidential Addendum to the Complaint, all of which discuss the confidential documents produced by co-Defendants during discovery.

Pursuant to paragraph 10 of the Protective Order of December 2, 2019 and to Your Honor's Rule III.d., Plaintiffs met and conferred with Defendants regarding the filing of documents designated as "Confidential" in connection with our filing of Plaintiffs' Motion to Vacate before Judge Oetken. Dkts. 411-413. Plaintiffs requested permission to file these materials publicly. While Defendants withdrew confidentiality designations on some, they would not do so as to all of the cited documents. Thus, Judge Oetken granted Plaintiffs leave to file materials under seal in connection with the earlier motion practice in this action in May 2021. Plaintiffs now seek leave

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to file the same exhibits to their papers here under seal, and to file under seal an Affirmation and Memorandum of law discussing their substance.

Thus, pursuant to paragraph 10 of the Protective Order and the Court's procedures, Plaintiffs respectfully seek permission to file under seal Plaintiffs' Memorandum of Law in Support of their Motion for Leave to Amend as well as the accompanying Affirmation or Declaration of Diane Paolicelli, and the exhibits in support, as they reference and describe documents deemed confidential by Defendants.

Respectfully submitted,

/s/ Steven Phillips

Steven Phillips

Diane Paolicelli

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cc: All counsel of record via ECF